

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

TPC GROUP INC., *et al.*,

Debtors.<sup>1</sup>

Chapter 11

Case No. 22-10493 (CTG)

Jointly Administered

BAYSIDE CAPITAL, INC. and CERBERUS  
CAPITAL MANAGEMENT, L.P.,

Plaintiffs,

v.

TPC GROUP INC.,

Defendant,

-and-

THE AD HOC NOTEHOLDER GROUP,

Intervenor Defendant.

Adv. Pro. No. 22-50372 (CTG)

**NOTICE OF AGENDA FOR HEARING  
SCHEDULED FOR JUNE 29, 2022, AT 1:00 PM (E.T.)**

**This hearing will be conducted in a hybrid format using in-person attendance and Zoom. Matters going forward in the Adversary Proceeding, *Bayside Capital Inc., et al. v. TPC Group Inc.*, Adv. Pro. No. 22-50372, will take place in-person at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3<sup>rd</sup> Floor, Courtroom #7, Wilmington, DE 19801. Matters going forward in the main bankruptcy case, *In re TPC Group Inc.*, No. 22-10493, will be conducted in a hybrid format using Zoom and in-person attendance. All participants over Zoom must register in advance. Please register by June 28, 2022 at 4:00 p.m. Eastern Time.**

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: TPC Group Inc. (3618); TPC Holdings, Inc. (7380); TPC Group LLC (8313); Texas Butylene Chemical Corporation (7440); Texas Olefins Domestic International Sales Corporation (4241); TPC Phoenix Fuels LLC (9133); Port Neches Fuels, LLC (1641); and TP Capital Corp. (6248). Each Debtor's corporate headquarters and mailing address is 500 Dallas St., Suite 2000, Houston, Texas 77002.

**COURTCALL WILL NOT BE USED FOR THIS HEARING.**

**Please use the following link to register for this hearing:**

<https://debuscourts.zoomgov.com/meeting/register/vJlsc-2vrz4vGuLP3IJ7zv99fEdiBomBTCo>

**After registering your appearance by Zoom, you will receive a confirmation email containing information about joining the hearing.**

**YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR  
YOU WILL NOT BE ALLOWED INTO THE MEETING.**

Topic: TPC Group, Inc.

Time: June 29, 2022 at 1:00 PM Eastern Time (US and Canada)

**ADJOURNED MATTERS**

1. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief ([D.I. 36](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to a date subject to the agreement of the parties for the Official Committee of Unsecured Creditors, Mockingbird Credit Opportunities Company, the Ad Hoc Group of Non-Consenting Noteholders, and the United States Trustee.

Responses Received:

- a) Limited Objection and Reservation of Rights of Mockingbird Credit Opportunities Company to the Debtors' DIP Motion ([D.I. 69](#), filed 06/01/22); and
- b) Objection of Ad Hoc Group of Non-Consenting Noteholders to Debtors' Motion for Entry of Interim and Final Orders Approving DIP Financing ([D.I. 76](#), filed 06/02/22).

Related Documents:

- a) [SEALED] Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate

Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief (D.I. 56, filed 06/01/22);

- b) [SEALED] Declaration of Zul Jamal in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief (D.I. 65, filed 06/01/22);
- c) Declaration of Robert A. Del Genio in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief ([D.I. 66](#), filed 06/01/22);
- d) Notice of Filing Proposed Redacted Version of the Declaration of Zul Jamal in Support of Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to Prepetition Secured Parties; (IV) Modifying the Automatic Stay; and (V) Granting Related Relief ([D.I. 68](#), filed 06/01/22); and
- e) Interim Order (I) Authorizing the Debtors to (A) Obtain Senior Secured Priming Superpriority Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (III) Granting Adequate Protection to the Prepetition Secured Parties, (IV) Modifying the Automatic Stay, and (V) Granting Related Relief ([D.I. 147](#), entered 06/03/22);

Status: This matter has been adjourned to the hearing scheduled for July 15, 2022 at 1:00 p.m. (ET).

- 2. Debtors' Motion for Entry of an Order Authorizing the Filing Under Seal of the DIP Fees in the Debtor in Possession Financing Facilities ([D.I. 166](#), filed 06/06/22).

Objection Deadline: June 22, 2022 at 4:00 p.m. (ET).

Responses Received:

- a) United States Trustee's Omnibus Objection to Debtors' Motions to Seal Filed at D.I. 164, 166, and 167 ([D.I. 239](#), filed 06/17/22).

Related Documents: None.

Status: This matter has been adjourned to the hearing scheduled for July 15, 2022 at 1:00 p.m. (ET).

3. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, (D) Continue Using P-Cards; and (E) Pay Bank Fees (II) Granting an Extension of Time to Comply With 11 U.S.C. § 345(B); and (III) Granting Related Relief ([D.I. 9](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to a date subject to further agreement for the Official Committee of Unsecured Creditors.

Responses Received:

- a) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a) Interim Order (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, (D) Continue Using P-Cards; and (E) Pay Bank Fees (II) Granting an Extension of Time to Comply With 11 U.S.C. § 345(b); and (III) Granting Related Relief ([D.I. 122](#), entered 06/02/22); and
- b) Supplement to Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Their Existing Cash Management System, (B) Maintain Existing Business Forms, (C) Continue Intercompany Arrangements, (D) Continue Using P-Cards; and (E) Pay Bank Fees (II) Granting an Extension of Time to Comply With 11 U.S.C. § 345(B); and (III) Granting Related Relief ([D.I. 222](#), filed 06/16/22).

Status: This matter has been adjourned to the hearing scheduled for July 15, 2022 at 1:00 p.m. (ET).

#### **MATTERS UNDER CERTIFICATION**

4. Motion of Debtors for Entry of an Order Authorizing the Debtors to (I) File (A) A Consolidated List of Creditors and (B) A Consolidated List of Debtors' Top Thirty Creditors, and (II) Provide Notices, Including Notices of Commencement of Cases and Section 341 Meeting ([D.I. 4](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET).

Responses Received: None.

Related Documents:

- a) Certification of Counsel Regarding Motion of Debtors for Entry of an Order Authorizing the Debtors to (I) File (A) a Consolidated List Of Creditors and (B) a Consolidated List Of Debtors' Top Thirty Creditors, And (II) Provide Notices, Including Notices of Commencement of Cases and Section 341 Meeting ([D.I. 111](#), filed 6/02/22);
- b) Interim Order Authorizing the Debtors to (I) File (A) a Consolidated List Of Creditors and (B) a Consolidated List Of Debtors' Top Thirty Creditors, And (II) Provide Notices, Including Notices of Commencement of Cases and Section 341 Meeting ([D.I. 126](#), entered 06/03/22).

Status: The Debtors did not receive any objections or informal comments to the Motion and, accordingly, the Debtors intend to file a certificate of no objection. Unless the Court has questions concerning the motion, no hearing is necessary.

- 5. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Assessments and (II) Granting Related Relief ([D.I. 6](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a) Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes and Assessments and (II) Granting Related Relief ([D.I. 116](#), entered on 06/02/22).

Status: The Debtors have resolved the Committee's informal comments and intend to file a revised form of final order granting the relief requested in the motion under a certification of counsel before the hearing.

- 6. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Reimbursable Expenses, and Other Obligations on Account of Compensation and Benefits Programs and (B) Continue Compensation and Benefits Programs and (II) Granting Related Relief ([D.I. 7](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a) Amended Exhibit(s) Notice of Filing of Revised Interim and Final Orders (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Reimbursable Expenses, and Other Obligations on Account of Compensation Benefits Programs and (B) Continue Compensation and Benefits Programs and (II) Granting Related Relief ([D.I. 108](#), filed 06/02/22); and
- b) Interim Order (I) Authorizing Debtors to (A) Pay Prepetition Wages, Salaries, Reimbursable Expenses, and Other Obligations on Account of Compensation and Benefits Programs and (B) Continue Compensation and Benefits Programs and (II) Granting Related Relief ([D.I. 115](#), entered 06/02/22).

Status: The Debtors have resolved the Committee's informal comments and intend to file a revised form of final order granting the relief requested in the motion under a certification of counsel before the hearing.

- 7. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to (A) Continue Insurance Programs and Surety Bond Program, (B) Pay All Obligations With Respect Thereto, and (C) Perform Under, Renew, Replace, and/or Enter Into New Premium Finance Agreements; and (II) Granting Related Relief ([D.I. 8](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a) Interim Order (I) Authorizing Debtors to (A) Continue Insurance Programs and Surety Bond Program, (B) Pay All Obligations With Respect Thereto, and (C) Perform Under, Renew, Replace, and/or Enter Into New Premium Finance Agreements; and (II) Granting Related Relief ([D.I. 118](#), entered 06/02/22).

Status: The Debtors have resolved the Committee's informal comments and intend to file a revised form of final order granting the relief requested in the motion under a certification of counsel before the hearing.

- 8. Motion of Debtors for Interim and Final Orders (I) Authorizing Debtors to Pay Prepetition Obligations to (A) Critical Vendors, (B) Certain Suppliers, (C) Lien Claimants, and (D) 503(B)(9) Claimants; and (II) Granting Related Relief ([D.I. 10](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Informal comments from the United States Trustee; and
- b) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a) Interim Order (I) Authorizing Debtors to Pay Prepetition Obligations to (A) Critical Vendors, (B) Certain Suppliers, (C) Lien Claimants, and (D) 503(b)(9) Claimants; and (II) Granting Related Relief ([D.I. 121](#), entered 06/02/22).

Status: The Debtors have resolved the United States Trustee's and Committee's informal comments and intend to file a revised form of final order granting the relief requested in the motion under a certification of counsel before the hearing.

- 9. Debtors' Motion for Entry of an Order Approving Rejection of Steam Sales Contract with Air Liquide Large Industries U.S. LP Effective as of the Petition Date ([D.I. 64](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 24, 2022 at 5:00 p.m. (ET) for the Official Committee of Unsecured Creditors.

Responses Received:

- a) Air Liquide Large Industries U.S. L.P.'s Response and Reservation of Rights with Respect to Debtors' Motion for Entry of an Order Approving Rejection of Steam Sales Contract Effective as of the Petition Date ([D.I. 277](#), filed 06/22/22).

Related Documents: None.

Status: The Debtors did not receive any objections or informal comments to the Motion and, accordingly, the Debtors intend to file a certificate of no objection. Unless the Court has questions concerning the motion, no hearing is necessary.

- 10. Debtors' Motion for Entry of an Order Authorizing Debtors to Seal Portions of their Creditor Matrix and Other Filings Containing Personal Identification Information ([D.I. 164](#), filed 06/06/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET).

Responses Received:

- a) United States Trustee's Omnibus Objection to Debtors' Motions to Seal Filed at D.I. 164, 166, and 167 ([D.I. 239](#), filed 06/17/22).

Related Documents:

- a) Notice of Filing Revised Proposed Redacted Version of the Consolidated List of Creditors ([D.I. 275](#), filed 06/06/22).

Status: The Debtors have resolved the United States Trustee's objection through revisions to the redactions in the creditor matrix and to the proposed order, will be filed under a certification of counsel. Unless the Court has questions concerning the motion, no hearing is necessary.

- 11. [SEALED] Debtors' Motion for Entry of an Order (I) Approving the Debtors Assumption of a Commercial Supply Contract with Formosa, as Amended, and (II) Granting Related Relief (D.I. 198, filed 06/13/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 24, 2022, at 5:00 p.m. (ET) for the Official Committee of Unsecured Creditors.

Responses Received: None.

Related Documents:

- a) Notice of Proposed Redacted Version of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of a Commercial Supply Contract with Formosa, as Amended, and (II) Granting Related Relief ([D.I. 204](#), filed 6/14/22).

Status: The Debtors did not receive any objections or informal comments to the Motion and, accordingly, the Debtors intend to file a certificate of no objection. Unless the Court has questions concerning the motion, no hearing is necessary.

- 12. Motion to File Under Seal Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of a Commercial Supply Contract with Formosa, as Amended, and (II) Granting Related Relief ([D.I. 205](#), filed 06/14/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 24, 2022, at 5:00 p.m. (ET) for the Official Committee of Unsecured Creditors.

Responses Received: None.

Related Documents: None.



Status: The Debtors did not receive any objections or informal comments to the Motion and, accordingly, the Debtors intend to file a certificate of no objection. Unless the Court has questions concerning the motion, no hearing is necessary.

13. Motion for Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals ([D.I. 214](#), filed 06/15/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET), extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Informal comments from the United States Trustee; and
- b) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents: None at this time.

Status: The Debtors have resolved the United States Trustee's and the Committee's informal comments through revisions to the proposed order, which will be filed under a certification of counsel. Unless the Court has questions concerning the motion, no hearing is necessary.

**MATTERS GOING FORWARD**

14. Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief ([D.I. 11](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Objection of Cokinos Energy Corporation to Entry of a Final Order on Debtors' Motion Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief ([D.I. 274](#), filed 06/22/22);

- b) Objection of Symmetry Energy Solutions, LLC to the Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief ([D.I. 276](#), filed 06/22/22);
- c) Objection by Clean Harbors Industrials Services to Motion of Debtors Pursuant to 11 U.S.C. §§ 105(A) and 366 and Fed. Bankr. P. 6003 and 6004 for Entry of Interim and Final Orders (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief ([D.I. 281](#), filed 06/22/22); and
- d) Cokinos Energy Corporation's Witness and Exhibit List for Hearing on Debtors' Motion Pursuant to 11 U.S.C. §§105(a) and 366 and Fed. R. Bankr. P. 6003 and 6004 for Entry of Final Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objection by Utility Companies, (III) Prohibiting Utility Companies from Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief ([D.I. 299](#), filed 06/27/22).

Related Documents:

- a) Interim Order (I) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Companies, (II) Establishing Procedures for Resolving Objections by Utility Companies, (III) Prohibiting Utility Companies From Altering, Refusing, or Discontinuing Service, and (IV) Granting Related Relief ([D.I. 119](#), entered 06/02/22).

Status: The Debtors are conferring with the objecting parties in an effort to resolve their objections. Symmetry Energy Solutions, LLC has agreed to adjourn its objection to the motion to the hearing to be held on July 15, 2022 at 1:00 p.m. (ET). This matter is going forward.

- 15. Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests In, and Claims Against, the Debtors and (B) Certain Worthless Stock Deduction Claims; (II) Setting Record Date for Sell-Down Notice Related to Trading in Claims Against the Debtors; and (III) Granting Related Relief ([D.I. 28](#), filed 06/01/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) United States Trustee's Omnibus Limited Objection and Reservation of Rights to (A) Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests In, and Claims Against, the Debtors and (B) Certain Worthless Stock Deduction Claims, (II) Setting Record Date for Sell-Down Notice Related to Trading in Claims Against the Debtors; And (III) Granting Related Relief; and (B) Motion of Debtors for Entry of [sic] an Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(B)(9); (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date; (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(B)(9) Requests; (IV) Approving Notice of Bar Dates; and (V) Granting Related Relief [D.I. 298](#), filed 06/27/22); and
- b) Informal comments from the Official Committee of Unsecured Creditors.

Related Documents:

- a) Notice of Filing of Revised Interim and Final Orders (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests In, and Claims Against, the Debtors and (B) Certain Worthless Stock Deduction Claims; (II) Setting Record Date for Sell-Down Notice Related to Trading in Claims Against the Debtors; and (III) Granting Related Relief ([D.I. 96](#), filed 06/02/22); and
- b) Interim Order (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests in the Debtors and (B) Certain Worthless Stock Deduction Claims, (II) Setting Record Date for Sell-Down Notice Related to Trading in Claims Against the Debtors; and (III) Granting Related Relief ([D.I. 120](#), entered 06/02/22).

Status: The Debtors have resolved the Committee's informal comments and expect to resolve the issues raised in reservation of rights filed by the United States Trustee. Accordingly, the Debtors intend to file a revised form of final order granting the relief requested in the motion under a certification of counsel before the hearing. If the Debtors are unable to resolve the issues raised by the United States Trustee, this matter will go forward at the hearing.

- 16. Motion to File Under Seal Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 55](#), filed 06/01/22).

Objection Deadline: June 15, 2022 at 4:00 p.m. (ET).

Responses Received:

- a) Informal comments from the United States Trustee.

Related Documents:

- a) Notice of Proposed Redacted Version of Debtors' Motion for Entry of an Order (I) Approving the Debtors' Assumption of Commercial Contracts, as Amended, and (II) Granting Related Relief ([D.I. 54](#), filed 06/01/22).

Status: The Debtors intend to resolve the United States Trustee's informal comments with revisions to the redacted version of the motion and file a final order granting the relief requested in the motion under a certification of counsel before the hearing.

- 17. Motion to File Under Seal Portions of the Declaration of Robert A. Del Genio ([D.I. 167](#), filed 06/07/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET).

Responses Received:

- a) United States Trustee's Omnibus Objection to Debtors' Motions to Seal Filed at D.I. 164, 166, and 167 ([D.I. 239](#), filed 06/17/22).

Related Documents:

- a) Notice of Filing Proposed Redacted Version of Declaration of Robert A. Del Genio ([D.I. 70](#), filed 06/01/22).

Status: This matter is going forward.

- 18. Debtors' Motion for an Order Authorizing the Debtors to Employ and Compensate Professionals Utilized in the Ordinary Course of Business ([D.I. 178](#), filed 06/08/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET).

Responses Received:

- a) Informal comments from the Official Committee of Unsecured Creditors; and
- b) Objection of the United States Trustee to the Debtors' Motion for an Order Authorizing the Debtors [sic] to Employ and Compensate Professionals Utilized in the Ordinary Course of Business ([D.I. 295](#), filed 06/24/22).<sup>2</sup>

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<sup>2</sup> The Debtors agreed to extend the United States Trustee's objection deadline to June 24, 2022 at 5:00 p.m. (ET).

Related Documents: None.

Status: The Debtors have resolved the Committee's informal comments and expect to resolve the issues raised in reservation of rights filed by the United States Trustee. Accordingly, the Debtors intend to file a revised form of final order granting the relief requested in the motion under a certification of counsel before the hearing. If the Debtors are unable to resolve the issues raised by the United States Trustee, this matter will go forward at the hearing.

19. Motion of Debtors for Entry of an Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment under Section 503(b)(9); (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date; (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests; (IV) Approving Notice of Bar Dates; and (V) Granting Related Relief ([D.I. 208](#), filed 06/14/22).

Objection Deadline: June 22, 2022, at 4:00 p.m. (ET); extended to June 27, 2022, at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors and the United States Trustee.

Responses Received:

- a) Objection to the Motion of Debtors for Entry of an Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment under Section 503(b)(9); (II) Establishing Amended Schedules Bar Date and Rejection Damages Bar Date; (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(b)(9) Requests; (IV) Approving Notice of Bar Dates; and (V) Granting Related Relief (Dckt. No. 208) ([D.I. 292](#), filed 06/23/22);
- b) United States Trustee's Omnibus Limited Objection and Reservation of Rights to (A) Motion of Debtors for Entry of Interim and Final Orders (I) Establishing Notification Procedures and Approving Restrictions on (A) Certain Transfers of Interests In, and Claims Against, the Debtors and (B) Certain Worthless Stock Deduction Claims, (II) Setting Record Date for Sell-Down Notice Related to Trading in Claims Against the Debtors; And (III) Granting Related Relief; and (B) Motion of Debtors for Entryof [sic] an Order: (I) Setting Bar Dates for Filing Proofs of Claim, Including Requests for Payment Under Section 503(B)(9); (II) Establishing Amended Schedules Bar Date and Rejection Damages Bart Date; (III) Approving the Form of and Manner for Filing Proofs of Claim, Including Section 503(B)(9) Requests; (IV) Approving Notice of Bar Dates; and (V) Granting Related Relief [D.I. 298](#), filed 06/27/22).
- c) Informal comments from the Official Committee of Unsecured Creditors; and
- d) Informal comments from the Pension Benefit Guaranty Corporation.

Related Documents: None.

Status: This matter is going forward.

**ADVERSARY PROCEEDING:**

**Bayside Capital Inc., et al. v. TPC Group Inc., Adv. Pro. No. 22-50372**

20. [SEALED] Ad Hoc Group of Non-Consenting Noteholders' Motion for Summary Judgment (A.D.I. 4, filed 06/02/22).

Objection Deadline: June 17, 2022 at 11:59 p.m. (ET).

Responses Received:

- a) [SEALED] TPC Group Inc.'s Brief in Opposition to Plaintiff's Motion for Summary Judgment (A.D.I. 50, filed 06/17/22); and
- b) The Ad Hoc Noteholders Group's Memorandum of Law in Support of Its Cross-Motion for Summary Judgment and Opposition to Plaintiff's Motion for Summary Judgment ([A.D.I. 44](#), filed 06/17/22).

Related Documents:

- a) Complaint for Declaratory Judgment ([A.D.I. 1](#));
- b) [SEALED] Declaration of Aaron L. Renenger in Support of Ad Hoc Group of Non-Consenting Noteholders' Motion for Summary Judgment (A.D.I. 5, filed 06/02/22);
- c) Motion to File Under Seal Certain Pleadings and Documents of the Ad Hoc Group of Non-Consenting Noteholders ([A.D.I. 7](#), filed 06/02/22);
- d) [REDACTED] Ad Hoc Group of Non-Consenting Noteholders' Motion for Summary Judgment ([A.D.I. 10](#), filed 06/02/22);
- e) [REDACTED] Declaration of Aaron L. Renenger in Support of the Ad Hoc Group of Non-Consenting Noteholders' Motion for Summary Judgment ([A.D.I. 11](#), filed 06/02/22);
- f) Order Granting Ad Hoc Group of Non-Consenting Noteholders' Motion for Expedited Hearing on Motion for Summary Judgment ([A.D.I. 22](#), filed 06/09/22);
- g) [SEALED] Declaration of Patrick Hurt (A.D.I. 41, filed 06/17/22);
- h) [SEALED] Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Further Support of Their Motion for Summary Judgment and in Opposition to Intervenor-Defendant's Motion for Summary Judgment (A.D.I. 54, filed 06/24/22);

- i) Declaration of Oscar Shine in Support of Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Further Support of Their Motion for Summary Judgment and in Opposition to Intervenor-Defendant's Motion for Summary Judgment ([A.D.I. 55](#), filed 06/24/22); and
- j) Plaintiffs-Counterclaim Defendants' Motion for Leave to Exceed Page Limitation Re: Memorandum of Law in Further Support of Their Motion for Summary Judgment and in Opposition to Intervenor-Defendant's Motion for Summary Judgment ([A.D.I. 56](#), filed 06/24/22).

Status: This matter is going forward.

21. Motion for Summary Judgment ([A.D.I. 16](#), filed 06/09/22).

Objection Deadline: June 22, 2022 at 11:59 p.m. (ET).

Responses Received:

- a) [SEALED] Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Opposition to Defendant-Counterclaimants' Motion to Dismiss, in Support of Plaintiffs-Counterclaim Defendants' Motion to Strike or Dismiss Defendant-Counterclaimants' Initial Counterclaim, in Opposition to Defendant-Counterclaimants' Motion for Summary Judgment, and in Support of Plaintiffs-Counterclaim Defendants' Motion to Dismiss Defendant-Counterclaimants' New Counterclaim (A.D.I. 50, filed 06/22/22).

Related Documents:

- a) Counterclaim for Declaratory Judgment ([A.D.I. 15](#), filed 06/09/22);
- b) Opening Brief in Support of Motion for Summary Judgment ([A.D.I. 17](#), filed 06/09/22); and
- c) Notice of Filing of Exhibit B to Counterclaim for Declaratory Judgment ([A.D.I. 20](#), filed 06/09/22);
- d) Order Granting Ad Hoc Group of Non-Consenting Noteholders' Motion for Expedited Hearing on Motion for Summary Judgment ([A.D.I. 22](#), filed 06/09/22); and
- e) TPC Group Inc.'s Answer and Counterclaim ([A.D.I. 47](#), filed 06/22/22).

Status: Pursuant to the Order Granting Ad Hoc Group of Non-Consenting Noteholders' Motion for Expedited Hearing on Motion for Summary Judgment (A.D.I. 47), the Debtors'



intend to file a reply in support of the Motion for Summary Judgment no later than June 28, 2022 at 5:00 p.m. (ET).

22. Motion to Dismiss the Complaint for Declaratory Judgment ([A.D.I. 18](#), filed 06/09/22).

Objection Deadline: June 22, 2022 at 11:59 p.m. (ET).

Responses Received:

- a) [SEALED] Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Opposition to Defendant-Counterclaimants' Motion to Dismiss, in Support of Plaintiffs-Counterclaim Defendants' Motion to Strike or Dismiss Defendant-Counterclaimants' Initial Counterclaim, in Opposition to Defendant-Counterclaimants' Motion for Summary Judgment, and in Support of Plaintiffs-Counterclaim Defendants' Motion to Dismiss Defendant-Counterclaimants' New Counterclaim (A.D.I. 50, filed 06/22/22).

Related Documents:

- a) Opening Brief in Support of Motion to Dismiss ([A.D.I. 19](#), filed 06/09/22); and
- b) Order Granting Ad Hoc Group of Non-Consenting Noteholders' Motion for Expedited Hearing on Motion for Summary Judgment ([A.D.I. 22](#), filed 06/09/22).

Status: This matter is going forward.

23. The Ad Hoc Noteholder Group's Cross-Motion for Summary Judgment and Opposition to Plaintiffs' Motion for Summary Judgment ([A.D.I. 43](#), filed 06/17/22).

Objection Deadline: June 22, 2022 at 11:59 p.m. (ET).

Responses Received:

- a) [SEALED] Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Further Support of Their Motion for Summary Judgment and in Opposition to Intervenor-Defendant's Motion for Summary Judgment (A.D.I. 54, filed 06/24/22).

Related Documents:

- a) Order Granting Ad Hoc Group of Non-Consenting Noteholders' Motion for Expedited Hearing on Motion for Summary Judgment ([A.D.I. 22](#), filed 06/09/22);
- b) The Ad Hoc Noteholders Group's Memorandum of Law in Support of Its Cross-Motion for Summary Judgment and Opposition to Plaintiff's Motion for Summary Judgment ([A.D.I. 44](#), filed 06/17/22);



- c) Declaration of Oscar Shine in Support of Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Further Support of Their Motion for Summary Judgment and in Opposition to Intervenor-Defendant's Motion for Summary Judgment ([A.D.I. 55](#), filed 06/24/22); and
- d) Plaintiffs-Counterclaim Defendants' Motion for Leave to Exceed Page Limitation Re: Memorandum of Law in Further Support of Their Motion for Summary Judgment and in Opposition to Intervenor-Defendant's Motion for Summary Judgment ([A.D.I. 56](#), filed 06/24/22).

Status: This matter is going forward.

24. Plaintiff-Counterclaim Defendants' Motion to Strike or Dismiss Defendant-Counterclaimant's Initial Counterclaim ([A.D.I. 48](#), filed 06/22/22).

Objection Deadline: June 28, 2022 at 5:00 p.m. (ET).

Responses Received: The Debtors intend to object to the Motion.

Related Documents:

- a) Counterclaim for Declaratory Judgment ([A.D.I. 15](#), filed 06/09/22); and
- b) [SEALED] Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Opposition to Defendant-Counterclaimants' Motion to Dismiss, in Support of Plaintiffs-Counterclaim Defendants' Motion to Strike or Dismiss Defendant-Counterclaimants' Initial Counterclaim, in Opposition to Defendant-Counterclaimants' Motion for Summary Judgment, and in Support of Plaintiffs-Counterclaim Defendants' Motion to Dismiss Defendant-Counterclaimants' New Counterclaim (A.D.I. 50, filed 06/22/22).

Status: This matter is going forward.

25. Plaintiff-Counterclaim Defendants' Motion to Dismiss Defendant-Counterclaimant's New Counterclaim ([A.D.I. 49](#), filed 06/22/22).

Objection Deadline: June 28, 2022 at 5:00 p.m. (ET).

Responses Received: The Debtors intend to object to the Motion.

Related Documents:

- a) TPC Group Inc.'s Answer and Counterclaim ([A.D.I. 47](#), filed 06/22/22); and

- b) [SEALED] Plaintiffs-Counterclaim Defendants' Consolidated Memorandum of Law in Opposition to Defendant-Counterclaimants' Motion to Dismiss, in Support of Plaintiffs-Counterclaim Defendants' Motion to Strike or Dismiss Defendant-Counterclaimants' Initial Counterclaim, in Opposition to Defendant-Counterclaimants' Motion for Summary Judgment, and in Support of Plaintiffs-Counterclaim Defendants' Motion to Dismiss Defendant-Counterclaimants' New Counterclaim (A.D.I. 50, filed 06/22/22).

Status: This matter is going forward.

Dated: June 27, 2022  
Wilmington, Delaware

**BAKER BOTTS L.L.P.**

James R. Prince (admitted *pro hac vice*)  
Kevin Chiu (admitted *pro hac vice*)  
2001 Ross Avenue, Suite 900  
Dallas, Texas 75201-2980  
Telephone: (214) 953-6500  
Facsimile: (214) 953-6503  
Email: jim.prince@bakerbotts.com  
kevin.chiu@bakerbotts.com

-and-

**BAKER BOTTS L.L.P.**

Scott R. Bowling (admitted *pro hac vice*)  
30 Rockefeller Plaza  
New York, New York 10112  
Telephone: (212) 408-2500  
Facsimile: (212) 259-2501  
Email: scott.bowling@bakerbotts.com

-and-

**BAKER BOTTS L.L.P.**

David R. Eastlake (admitted *pro hac vice*)  
Lauren N. Randle (admitted *pro hac vice*)  
910 Louisiana Street  
Houston, Texas 77002  
Telephone: (713) 229-1234  
Facsimile: (713) 229-1522  
Email: david.eastlake@bakerbotts.com  
lauren.randle@bakerbotts.com

/s/ Brian Loughnane

**MORRIS, NICHOLS, ARSHT & TUNNELL  
LLP**

Robert J. Dehney (No. 3578)  
Curtis S. Miller (No. 4583)  
Daniel B. Butz (No. 4227)  
Matthew O. Talmo (No. 6333)  
Brian Loughnane (No. 6853)  
1201 N. Market Street, 16th Floor  
P.O. Box 1347  
Wilmington, Delaware 19899-1347  
Telephone: (302) 658-9200  
Facsimile: (302) 658-3989  
Email: rdehney@morrisnichols.com  
cmiller@morrisnichols.com  
dbutz@morrisnichols.com  
mtalmo@morrisnichols.com  
bloughnane@morrisnichols.com

*Proposed Attorneys for Debtors  
and Debtors in Possession*